

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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PETER ROST,	:	
	:	
Plaintiff,	:	
	:	05 Civ. 10384 (GBD) (GWG)
	:	ECF
v.	:	
	:	
PFIZER, INC., PHARMACIA, INC.,	:	NOTICE OF CROSS-MOTION
MARIE-CAROLINE SAINPY,	:	FOR A PROTECTIVE ORDER
KAREN KATEN, JEFFREY	:	
KINDLER and HENRY MCKINNELL,	:	
	:	
Defendants.	:	

PLEASE TAKE NOTICE that upon the accompanying Declaration of Christopher P. Lenzo, Esq., and the exhibits attached thereto, and Plaintiff's Brief in Opposition to Defendants' Motion to Compel Discovery of Plaintiff's Assets and in Support of Plaintiff's Cross Motion for a Protective Order, Plaintiff Peter Rost, by and through his attorneys Green Savits & Lenzo, LLC, will move this Court, before the Honorable Gabriel W. Gorenstein, United States Magistrate Judge, at the United States Court House, 500 Pearl Street, New York, New York 10007, on a date and at a time to be determined by the Court, to enter a protective order prohibiting defendants from asking any witnesses deposition questions about plaintiff's assets, whether held individually or jointly.

Dated: January 11, 2008

GREEN SAVITS & LENZO, LLC

/s/ Christopher P. Lenzo

By: _____
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